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November 20, 2020

BY ECF

Honorable Andrew L. Carter Jr.  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: Lovati et al. v. Petroleos de Venezuela, S.A., 19-Civ-04799-AJC

Dear Judge Carter:

With the consent of all parties, and pursuant to Your Honor's October 13, 2020 memo endorsement (D.E. 40), we submit this joint report concerning the status of the parties' discussions of additional discovery needed beyond what is set forth in the parties' initial disclosures served on November 6, 2020.

Thus far, plaintiffs have not identified any need for additional discovery beyond the initial disclosures. Defendants have specifically requested documents sufficient to demonstrate the ownership of each of the plaintiffs of the Notes as well as documents concerning a December 8, 2019 inter-plaintiff transfer of certain beneficial ownership interests that plaintiffs recently disclosed. The parties are continuing to discuss the timing of all disclosure, the need for any other disclosure, and whether disclosure and/or amendment of plaintiffs' complaint might moot defendant's proposed Rule 12(c) motion.

Respectfully,

/s David T. McTaggart

DTM:hs

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